



Bureau of HIV and STD Prevention

HIV/STD Clinical Resources Division
HIV/STD Epidemiology Division
HIV/STD Health Resources Division

Est. December 18, 1997

Rev. April 3, 1998

HIV/STD Policy No. 540.001

SANCTIONS IMPOSED UPON A CONTRACTOR FOR NON-COMPLIANCE WITH CONTRACTS INVOLVING STATE/FEDERAL FUNDS

PURPOSE

This policy establishes the process for imposing sanctions on an organization (Contractor) which contracts with the Texas Department of Health (TDH) Bureau of HIV and STD Prevention (Bureau) and is found to be out of compliance with contract requirements. The policy also outlines what optional actions may be taken by the Bureau before imposing a sanction; the reasons for imposing sanctions; how the Bureau imposes a sanction, and the time frame for imposing a sanction. Finally, the policy explains how the Contractor responds to either a required action or a sanction and the recourse available to a Contractor regarding that action or sanction.

BACKGROUND

The Bureau administers state and federal funds to accomplish its mission of preventing and treating the spread of HIV/STD diseases in Texas. The Bureau enters into contracts with various Contractors across the state to administer programs and provide services to people who are infected or affected by these diseases. The Bureau is responsible for reviewing and monitoring how each Contractor administers the services and allotted funds to insure that the services are appropriately provided and that the Contractor properly accounts for the funds. To fulfill this responsibility, Bureau or TDH staff monitor the completion of required Contractor reports and voucher requests, conduct standard Contractor compliance reviews, or investigate complaints against a Contractor. As a result, it may be necessary to take action against a Contractor who is not in compliance with the contract terms or who may be jeopardizing the health or safety of persons receiving services. Such action may also be necessary to ensure that funds are being administered according to the contract terms.

AUTHORITY

Rider 13 of the General Appropriations Act of the 75th Legislature; *TDH Contracting Guide for Client Services*; Uniform Grant and Contract Management Act (UGCMA); Uniform Grant Management Standards (UGMS) as amended by revised federal circulars 74-4, A-122, A-128 and A-133; Texas Health and Safety Code, § 85.043; Texas Administrative Code, Title 25, §1.51-1.55, §98.23, §98.27-98.3

DEFINITIONS AS APPLIED TO THIS POLICY

Accelerated monitoring	A temporary status in which more frequent or extensive monitoring is conducted than would routinely be done and monitoring visits may be announced or unannounced.
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1	Contract	A legally enforceable agreement by which goods, services, property or property rights are provided in return for considerations.
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3	Contractor	A legal entity under contract with TDH to provide goods or services to people who are infected or affected by HIV, AIDS or STDs, or to implement goals supporting the Bureau's mission.
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5	Corrective action	An action required of a Contractor to develop a detailed plan to correct a deficiency found by a reviewer or by staff who are monitoring Contractor activities. The plan could include what will be done, who will do it, expected results, how progress will be monitored, and how long it will take to resolve the deficiency.
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7	Emergency actions	Immediate actions imposed on a Contractor because:
8		a. there is a high potential of danger to clients;
9		b. Contractor action or inaction presents a high possibility that serious harm or injury to patients or clients could occur, has already occurred or may well occur again if clients are not protected or the threat removed;
10		c. the Contractor is not meeting a performance measure;
11		d. the Contractor is being reimbursed for expenditures which are not in accordance with federal and/or state laws and regulations or contract provisions, or
12		e. the Contractor is spending funds inappropriately.
13	Noncompliance	A finding by a TDH reviewer or other TDH staff wherein a Contractor fails to perform or inadequately performs contract provisions that may result in emergency actions, corrective actions and/or sanction(s).
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15	Probation	A sanction in which the Contractor may be placed on accelerated monitoring for a period not to exceed six months by which time items of noncompliance must be resolved or substantial improvements shown.
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17	Reviewer	A member of the TDH or Bureau staff who conducts a site visit to audit or review Contractor operations and/or administration of contract funds. The term also includes Bureau or TDH staff who monitor Contractor reporting requirements or financial accounting activities.
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19	Sanction	An intervention or adverse action taken by the Bureau or TDH against or toward a Contractor due to noncompliance with contract provisions, program performance, or an inability/unwillingness to resolve legitimate, substantiated complaints.
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NONCOMPLIANCE WITH CONTRACT TERMS

Each Contractor receiving funds through the Bureau signs a contract which outlines tasks or requirements associated with receiving the funds. In signing the contract, the Contractor agrees to perform those tasks or requirements. Noncompliance results when a discrepancy is found in the administration of a program or a service, or an irregularity is found in the way the Contractor is spending and/or accounting for the funds. The discrepancy may be found during a compliance review or it may be found by staff responsible for monitoring Contractor compliance with reporting or financial accounting activities. The Contractor may also be found in noncompliance for failing to cooperate with the investigation of a complaint or failing to respond to adverse findings resulting from a complaint filed against the Contractor.

The Bureau has various options it may take in regard to contract noncompliance. The options include emergency action, corrective action or imposition of a sanction. The decision to require corrective action or to impose a sanction depends on the severity of the finding or if similar or recurring problems have been found in the past.

EMERGENCY ACTION

The Bureau is authorized to take an immediate emergency action when a reviewer determines that a finding of noncompliance warrants such action.

Time frame and method for notifying Contractor of emergency action

The reviewer, after conferring with appropriate Bureau management staff, gives a verbal notice on-site to the Contractor to immediately discontinue the action or process. The reviewer provides written notice of the required emergency action by certified mail within 10 calendar days.

Time frame for the Contractor to respond to emergency action

The Contractor must immediately discontinue the action or process that has prompted the required emergency action. In addition, the Contractor must provide an acceptable action plan in a time frame specified by the Bureau to ensure that the circumstances or conditions which caused noncompliance will not recur.

Bureau action when the Contractor fails to respond to the emergency action notice

The Bureau will decide what additional actions or recourse may be needed in order to effectively stop the noncompliant action or process. Recourse may include the imposition of any of the corrective actions listed in this policy and/or imposition of any of the sanctions described in this policy or any combination thereof. The Bureau may also refer the matter to the Office of General Counsel for appropriate action.

TDH communication regarding emergency action

When emergency action is required, Bureau divisions or programs must notify the Associate Commissioner for Disease Control and Prevention and the Office of Intergovernmental Policy through appropriate agency channels. The Bureau Chief or division or program managers make the decision when notification should be carried out.

Discontinuing emergency action

Emergency action is discontinued when the condition causing the Bureau to take emergency action has been eliminated and the Bureau is reasonably sure that the condition will not recur. Compliance will be determined by accelerated monitoring or other appropriate TDH or Bureau procedures. The Bureau notifies the Contractor in writing that the condition which elicited the emergency action(s) has been resolved and additional action is not required.

CORRECTIVE ACTION

When possible, Bureau staff will require the Contractor to remedy adverse findings by recommending that the contractor take certain corrective action(s) before imposing a sanction(s). When corrective action is recommended, the Contractor is subject to the following Bureau actions:

- announced or unannounced compliance reviews to determine the cause(s) of noncompliance;
- technical assistance/training from other divisions and programs to assist the Contractor in rectifying certain noncompliant areas of service delivery or administration;
- follow up site visits, and
- accelerated monitoring.

The decision to require corrective action or to impose a sanction depends on the severity of the finding or if similar or recurring problems have been found in the past.

Time frame and method for notifying the Contractor of required corrective action

Within 45 calendar days of finding Contractor irregularities the Bureau sends the Contractor a written notice requiring corrective action to resolve the irregularities. The notice may be part of the site visit report or it may be a letter relating findings from contract monitoring activities. The notice informs the Contractor of the need to develop an action plan to address the irregularities that were found, the expected time frame for resolving the irregularities and the time frame for responding to the corrective action requirement.

Time frame for the Contractor to respond to the corrective action

The Contractor has 35 calendar days from the date of the letter to respond to the corrective action requirement by outlining the action that has been taken or will be taken to address the findings. A time frame for completing the action plan and how the Contractor will determine the effectiveness of the action plan should be included.

Bureau action when the Contractor fails to respond to the corrective action notice

The Bureau will decide whether or not to issue a formal sanction if, by the end of 35 calendar days after the date of the letter, the Contractor fails to respond by providing the proposed action plan.

Bureau action when the Contractor responds to the corrective action notice

Bureau staff which directed the use of a corrective action reviews the Contractor's response and evaluates it. Within 30 calendar days or less from receipt of the plan, the following alternatives are available:

1. When the corrective action is acceptable, Bureau staff reply in writing acknowledging receipt of the response and that it is accepted.
2. When the corrective action is unacceptable, staff informs the Contractor in writing that additional action or information is needed. The Contractor must respond within 35 calendar days of the date of the letter. Staff may discuss unacceptable portions of the corrective action plan with the Contractor over the telephone. Any agreements of changes from those discussions should be documented in the Contractor's file. The Bureau may decide to impose a formal sanction if the Contractor fails to negotiate a satisfactory corrective action plan.

Bureau action when corrective action fails to resolve noncompliance

When corrective action has been required and the Contractor is still not in compliance or will not comply, the Bureau may then decide to impose a sanction. Staff involved in the finding and their division or program director determine what sanction is appropriate for the finding.

SANCTIONS THAT MAY BE IMPOSED BY THE BUREAU

A list of possible sanctions is found in the TDH contract which both parties sign. One or more sanctions may be imposed depending on the extent of the problem, the impact on the clients being served and/or the seriousness of the problem. For the purposes of this policy, sanctions are shown in three different levels depending on the seriousness of the action to be taken.

LEVEL I SANCTIONS

One or more of the following Level I sanctions may be imposed:

1. accelerated monitoring;
2. requiring the provider to accept technical/management assistance or training;
3. disallowing claims for payment or reimbursement on expenditures and expenditures for which prior approval was required but not obtained;
4. requiring additional, more detailed, programmatic reports;
5. requiring additional prior approvals for expenditure of funds, and/or
6. referral to the TDH Grants Management Division or Internal Audit for monitoring.

Imposing the level I sanction

Staff of the program finding noncompliance may impose the Level I sanction. Staff should follow any division or program procedures when imposing a level I sanction.

Time frame for Contractor sanction notification

The Bureau provides written notice by certified mail to the Contractor within 30 calendar days of finding noncompliance.

Content of the sanction notice and method of calculating response time

Bureau staff issues a written notice to the Contractor telling the Contractor that this is the official notice imposing the sanction. **The sanction is effective upon receipt of the notice.** The notice must contain the following:

1. the area(s) found to be in noncompliance;
2. any references to previous correspondence;
3. a narrative outlining what must be done to achieve compliance;
4. the expected time frame for reaching compliance, and
5. the deadline for the Contractor to reply.

The time frame for the Contractor's response begins with the receipt date on the return receipt or the date delivery was attempted whichever comes first. That date is considered day zero.

NOTE: When accelerated monitoring is one of the sanctions, a notice may not be sent prior to performing the monitoring.

Contractor action in response to a notice of sanction

The Contractor has 30 calendar days from the date the sanction notice is received to respond in writing to the findings. The written response is sent to the person imposing the sanction and must include the following:

- acknowledgment of receiving the notice;
- a narrative telling how the area(s) of noncompliance will be corrected, and
- specific time frames for achieving compliance.

The Contractor may also ask for reasonable technical/management assistance or training to correct the area of noncompliance. The division or program will decide if the request is reasonable and within the capability of the Bureau to provide the requested assistance.

Bureau action when the Contractor fails to respond to the Level I sanction notice

The Bureau will decide whether or not to issue additional sanctions if, by the end of 30 calendar days, the Contractor fails to respond by providing the proposed action plan.

Action required of the Bureau when a Contractor responds to the sanction

The Bureau division or program which imposed the sanction evaluates the response to determine if the actions to be taken are appropriate and acceptable. The following alternatives are available:

When the response is acceptable, the division or program acknowledges receipt of the response in writing and informs the Contractor that it is accepted.

When the response is unacceptable, the division director or program director (or their designee) and the employee who issued the sanction, may negotiate directly with the Contractor to agree on an acceptable response or impose additional sanctions.

All decisions and agreements are reduced to writing and sent to the Contractor for authorized approval signatures.

Lifting the sanction

A sanction is lifted when the area(s) of noncompliance has been brought into compliance. Compliance may be determined by monitoring through normal TDH or Bureau procedures. TDH or the Bureau notifies the Contractor in writing that the sanction is lifted.

Should a contract with a Contractor expire, the sanction remains active until the Contractor has, if necessary, made restitution or has been prosecuted. In addition, according to the general provisions of contracts signed by TDH and its Contractors, TDH may delay contract execution with a Contractor while proposed or actual sanctions are pending resolution. The Bureau Chief and staff imposing the sanction will determine what action, if any, will be taken on the new contract.

All correspondence, notices and other pertinent documentation about the sanction become a permanent part of the Contractor's file.

TDH communication regarding sanctions

Information regarding sanctions may be shared with other programs in TDH. Staff may send a copy of the sanction notice to other staff or verbally advise other staff of the sanction. Staff, at the direction of their supervisor, *may* notify the Associate Commissioner for Disease Control and Prevention and the Office of Intergovernmental Policy through regular agency channels if appropriate. Appropriate regional staff should always be notified about sanctions that are imposed on Contractors in the region. Regional staff should also be involved, as appropriate, in determining if and when sanctions are to be imposed or lifted.

LEVEL II SANCTIONS

The following are the Level II sanctions which may be imposed by the Bureau:

1. Probation for a time period specified by the Bureau
2. Temporarily withholding a portion of funds
3. Other actions the TDH deems to be appropriate

Parties responsible for the sanction decision

Staff finding noncompliance involving Level II Sanctions submits a written report to their supervisor. Program staff, their supervisor, program or division director, and the Bureau Chief determine what sanction(s) to impose.

Time frame for the Contractor sanction notification

The Bureau provides written sanction notice by certified mail to the Contractor within 30 calendar days of finding noncompliance.

Content of the sanction notice and method of calculating response time

Bureau staff issues a written notice to the Contractor telling the Contractor that this is the official notice imposing the sanction. **The sanction is effective upon receipt of the notice.** The notice must contain the following:

1. the area(s) found to be in noncompliance;
2. any references to previous correspondence;
3. a narrative outlining what must be done to achieve compliance;
4. the expected time frame for reaching compliance, and
5. the deadline for the Contractor to reply.

The time frame for the Contractor's response begins with the receipt date on the return receipt or the date delivery was attempted whichever comes first. The date of receipt or attempted delivery is considered day zero.

NOTE: When accelerated monitoring is one of the sanctions or used as a method of determining compliance, a notice may not be sent prior to performing the monitoring.

Contractor action in response to a notice of sanction

The Contractor has 30 calendar days from the date the sanction notice is received to respond in writing to the findings. The written response is sent to the person imposing the sanction and must include the following:

1. acknowledgment of receiving the notice;
2. a narrative telling how the area(s) of noncompliance will be corrected, and
3. specific time frames for achieving compliance.

The Contractor may also ask for reasonable technical/management assistance or training to correct the area of noncompliance. The division or program will decide if the request is reasonable and within the capability of the Bureau to provide the requested assistance.

Bureau action when the Contractor fails to respond to the Level II sanction notice

The Bureau will decide whether or not to issue an additional sanction if, by the end of 30 calendar days, the Contractor fails to respond by providing the proposed action plan.

Action required of the Bureau when a Contractor responds to the sanction

1. When the response is acceptable, the division or program acknowledges receipt of the response in writing and informs the Contractor that it is accepted.
2. When the response is unacceptable, the division director or program director (or their designee) and the employee who issued the sanction, may negotiate directly with the Contractor to agree on an acceptable response or may impose additional sanctions.

All decisions and agreements are reduced to writing and sent to the Contractor for authorized approval signatures.

Departmental communication regarding sanctions

Internal communication between branches, programs, divisions and regional offices is essential when noncompliance is found and a Level II sanction is imposed or lifted. Noncompliance in one area can affect other TDH divisions or programs. When a decision is reached and a notice is sent to the Contractor, the program or division director notifies other program/division directors by sending them a copy of the notice. The Bureau Chief may share findings with other appropriate TDH departments or instruct the program or division director to share the findings. Send a copy of all sanction notices to appropriate regional offices.

When a Contractor is given a Level II sanction, Bureau divisions or programs notify the Associate Commissioner for Disease Control and Prevention and the Office of Intergovernmental Policy through appropriate agency channels.

Lifting the sanction

A sanction is lifted when the area(s) of noncompliance has been brought into compliance. Compliance may be determined by monitoring through normal TDH or Bureau procedures. The Bureau notifies the Contractor in writing that the sanction is lifted.

When the contract with a Contractor expires, the sanction remains active until the Contractor has, if necessary, made restitution or has been prosecuted. In addition, according to the general provisions of contracts signed by TDH and its Contractors, TDH may delay contract execution with a Contractor while proposed or actual sanctions are pending resolution. The Bureau Chief and staff imposing the sanction will determine what action, if any, will be taken on the new contract.

All correspondence, notices and other pertinent documentation about the sanction become a permanent part of the TDH Contractor's file.

LEVEL III SANCTIONS AND FINAL NOTICE OF PERMANENTLY WITHHOLDING CASH PAYMENTS

One or more of the following Level III sanctions may be imposed:

1. Termination of all or part of the contract.
2. Suspension of all or part of the TDH contract.
3. Denial of contract renewal or future contract awards for a period not to exceed five years.
4. Reduction of contract funding amounts if the Contractor is not:
 - a. achieving or maintaining the proposed level of service, or
 - b. spending funds appropriately and at a rate which will make full use of the award, or
 - c. providing services as set out in the contract.
5. Contract amendments resulting from noncompliance.

In addition to these sanctions, this process also applies to a final notice of permanently withholding cash payments.

Parties responsible for a decision to impose a sanction

Staff finding noncompliance involving Level III Sanctions submit a written report to their supervisor. Program staff, their supervisor, program or division director, and the Bureau Chief determine what sanction(s) to impose.

Time frame for Contractor sanction notification

The Bureau provides written notice by certified mail to the Contractor within 30 calendar days of finding noncompliance.

Content of the sanction notice and method of calculating response time

Bureau staff issues a written notice to the Contractor telling the Contractor that this is the official notice imposing the sanction, or that this is the final notice of permanently withholding cash payments. **The sanction or the permanent withholding of cash payments is effective upon receipt of the notice.** The notice must contain the following:

1. the area(s) found to be in noncompliance;
2. any references to previous correspondence;
3. a narrative outlining what must be done to achieve compliance;
4. the expected time frame for reaching compliance, and
5. the deadline for the Contractor to reply.

The time frame for the Contractor's response begins with the receipt date on the return receipt or the date delivery was attempted, whichever comes first. The receipt date or the attempted delivery date is considered day zero.

Contractor response to Level III sanction(s) or final notice of permanently withholding cash payments (25 TAC § 1.51-1.55)

When the Contractor wishes to protest the Level III sanction or final notice, a response requesting a due process hearing must be sent to the Bureau within 20 calendar days of receiving the sanction notice or final notice of permanently withholding cash payments. The response is addressed to the person who sent the notice and must be mailed or hand delivered.

The Contractor may also include the following:

1. a copy of the notification letter from TDH;
2. a written summary outlining the grounds upon which the Contractor bases the request;
3. a written description of the issue or issues to be resolved;
4. a written statement of the relevant facts;
5. documentation in support of the Contractor's position, and
6. a statement and listing of authorities who support the Contractor's position.

Bureau action when the Contractor fails to respond

After the 20 calendar days have elapsed, the Bureau sends a certified letter notifying the Contractor that the sanction is being enforced immediately.

Bureau response to the Contractor's due process hearing request

Within 10 working days after receiving the due process hearing request, the Bureau will ask the Office of General Counsel (OGC) to appoint a hearing officer to conduct the due process hearing. No action is taken on the sanction until the due process hearing is completed.

Due process hearing

The due process hearing allows the person requesting the hearing to:

1. prove that the basis of the proposed action is incorrect,
2. offer verbal and written testimony about the circumstances involved, and
3. question appropriate TDH representatives about the proposed action.

The hearing officer prepares a written recommendation for decision and a reason for the recommendation upon completion of the hearing. The recommendation is provided to both parties who may then file exceptions with the hearing officer. The recommendation and any exceptions are submitted to the Commissioner of Health, or a person designated by the Commissioner, for a final decision. A final decision is required as soon as possible, but no longer than 60 calendar days from the date the hearing is closed.

When the decision is to enforce the sanction, the Bureau informs the Contractor by certified mail that the sanction will be imposed immediately. When the decision is not to allow the sanction, all Bureau actions regarding that sanction are discontinued.

Departmental communication regarding sanctions

Internal communication between Bureau branches, programs, divisions and regional offices is essential when noncompliance is found and a Level III sanction is imposed. Noncompliance in one area can affect other divisions or programs. When a decision is reached and a notice is sent to the Contractor, the program or division director notifies other appropriate program/division directors by sending them a copy of the notice. The Bureau Chief may share the findings with other appropriate TDH departments, or instruct the program or division director to share the findings. Send a copy of the sanction notice to the appropriate regional office.

When a Contractor is given a Level III sanction, Bureau divisions or programs notify the Associate Commissioner for Disease Control and Prevention and the Office of Intergovernmental Policy through appropriate agency channels.

Lifting the sanction

A sanction is lifted when the area of noncompliance has been brought into compliance. Compliance may be determined by monitoring through normal TDH or Bureau

procedures. TDH or the Bureau notifies the Contractor in writing that the sanction is lifted.

When the contract with a Contractor is canceled or expires, the sanction remains active until the Contractor has, if necessary, made restitution or has been prosecuted. In addition, according to the general provisions of contracts signed by TDH and its Contractors, TDH may delay contract execution with a Contractor while proposed or actual sanctions are pending resolution.

All correspondence, notices and other pertinent documentation about the sanction becomes a permanent part of the TDH Contractor's file.

DATE OF LAST REVIEW:

November 13, 2002 Converted format from WordPerfect to Word.

REVISIONS

Page 1, line 2	Delete the phrase "ADMINISTERED BY THE TEXAS DEPARTMENT OF HEALTH".
Page 1, line 14	Add the phrase "and monitoring" after the word "reviewing".
Page 1, line 16	Add the phrase "monitor the completion of required Contractor reports and voucher requests" after the phrase "TDH staff".
Page 1, line 23	Delete the words "and Contract" after "(UGCMA); Uniform Grant". Delete the acronym "UGCMS" and add the acronym "UGMS"
Page 1, line 24	Delete the numbers and letter "87-A" and replace with the numbers "74-4".
Page 2, line 2	Delete the phrase "in a compliance review" after the word "reviewer". Add the phrase "or by staff who are monitoring Contractor activities" after the word "reviewer".
Page 2, line 3	Add a comma and the phrase "how progress will be monitored" and a comma after the phrase "expected results".
Page 2, line 15	Add the phrase "or other TDH staff" after the word "reviewer".
Page 2, line 16	Add the word "actions" and a comma after the word "emergency".
Page 2, line 22	Add the sentence "The term also includes Bureau or TDH staff who monitor Contractor reporting requirements or financial accounting activities." after the phrase "of contract funds".
Page 2, line 27	Add a comma and the word "substantiated" after the word "legitimate".
Page 2, line 31	Delete the comma and the phrase "during a review" after the word "when".
Page 2, line 32	Add the sentence "The discrepancy may be found during a compliance review or it may be found by staff responsible for monitoring Contractor compliance with reporting or financial accounting activities." after the word "funds".
Page 2, line 37	Delete the phrase "depending on the severity of the problems found" after the word "noncompliance".

1	Page 2, line 38	Add the sentence "The decision to require corrective action or to
2		impose a sanction depends on the severity of the finding or if
3		similar or recurring problems have been found in the past." after the
4		word "sanction".
5	Page 3, line 17	Add the word "Bureau" after the phrase "is required," divisions or
6		programs. Delete the phrase "within the Bureau" after the phrase
7		"divisions or programs".
8	Page 3, line 18	Add the phrase "Control and" after the phrase "Commissioner for
9		Disease".
10	Page 3, line 23	Add the word "reasonably" after the phrase "the Bureau is".
11	Page 4, line 1	Add the phrase "or to impose a sanction" after the phrase
12		"corrective action".
13	Page 4, line 5	Delete the comma and the phrase "often as part of a site visit
14		report" after the word "notice".
15	Page 4, line 10	Add the word "the" after the phrase "to respond to".
16	Page 4, line 11	Change the number 30 to 35. After the phrase "calendar days" add
17		the phrase "from the date of the letter".
18	Page 4, line 16	Change the number 30 to 35. After the phrase "calendar days" add
19		the phrase "from the date of the letter".
20	Page 4, line 18	Add the word "the" after the phrase "Contractor responds to".
21	Page 4, line 20	Change the letter T in the word "The" to lower case. Add the
22		following phrase "Within 30 calendar days or less from receipt of
23		the plan," at the beginning of the sentence.
24	Page 4, line 25	Add the word "calendar" after the number 30. Change the number
25		"30" to "35"
26	Page 5, line 10	Delete the word "unallowable" after the phrase "reimbursement on".
27	Page 7, line 5	Add the phrase "Control and" after the phrase "Commissioner for
28		Disease".
29	Page 7, line 8	Add the phrase "or lifted" after the word "imposed".
30	Page 7, line 17	Delete the word "The" at the front of the sentence. Add the phrase
31		"Program staff" and a comma and the word "their" on the front of
32		the sentence.
33	Page 8, line 28	Add the phrase "or lifted" after the word "imposed".
34	Page 9, line 2	Add the phrase "Control and" after the phrase "Commissioner for
35		Disease".
36	Page 9, line 18	Add the acronymn "TDH" after the phrase "part of the".
37	Page 9, line 28	Delete the word "The" at the front of the sentence.
38	Page 9, line 29	Add the phrase "Program staff, their" on the front of the sentence.
39	Page 11, line 22	Add the phrase "Control and" after the phrase "Commissioner for
40		Disease".
41	Page 11, line 33	Add the acronymn "TDH" after the phrase "part of the".